

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)

Office: Alaska State Office

Tracking Number: DOI-BLM-AK-0000-2017-0001-DNA

Casefile/Project Number: AA094207

Proposed Action Title/Type: Oil and Gas Lease Sale in the National Petroleum Reserve-Alaska (NPR-A)

Location/Legal Description: National Petroleum Reserve-Alaska (NPR-A), in Alaska's North Slope

A. Description of the Proposed Action and any applicable mitigation measures

To implement the National Petroleum Reserve in Alaska Integrated Activity Plan (NPR-A IAP) Record of Decision (ROD) signed February 21, 2013, and President Obama's direction in May, 2011 to conduct annual lease sales in the NPR-A, BLM proposes to hold an oil and gas lease sale on December 14, 2016 for lands in the NPR-A planning area (see map attached at the end of this DNA). Tracts to be offered in the lease sale are all within areas authorized for leasing by the Secretary of the Interior in the 2013 ROD.

A total of 145 tracts or approximately 1.4 million acres will be offered in the 2016 NPR-A oil and gas lease sale, all located within the approximately 11.8 million acres made available for oil and gas leasing under the ROD. Currently there are 134 authorized oil and gas leases totaling 895,909 acres in the NPR-A. Approximately 11 million acres, including approximately 3.1 million acres within the Teshekpuk Lake Special Area, are not available for oil and gas leasing under the 2013 ROD; none of these lands are being offered in the lease sale.

BLM developed and adopted in the 2013 ROD several Best Management Practices (BMPs) and lease stipulations to ensure that oil and gas operations are conducted in a manner that minimizes adverse impacts to the land, resources, land uses, and users. BMPs and lease stipulations (see Appendix A of the ROD) will be incorporated into lease terms associated with the proposed action. In addition, the ROD committed to studies and monitoring efforts to further protect surface resources.

The Record of Decision for the "Supplemental Environmental Impact Statement for the Alpine Satellite Development Plan for the Proposed Greater Mooses Tooth One Development Project" (GMT1) of February, 2015 allowed for the establishment of a "Regional Mitigation Strategy" (RMS) to be completed within 18 months.

B. Land Use Plan (LUP) Conformance

LUP Name:

- National Petroleum Reserve in Alaska Integrated Activity Plan/Environmental Impact Statement (2012) and Record of Decision (2013)
- Colville River Special Area Management Plan and associated Environmental Assessment, and Decision Record (July 2008) and the September 17, 2013 update.

(These documents are available online at <https://www.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=5251&dctmId=0b0003e8800fbba3>)

Date Approved:

- December 19, 2012 (NPR-A IAP) and February 21, 2013 (ROD)
- July 2008 (Colville River Special Area Management Plan); September 27, 2013 (Colville River Special Area Management Plan update)

The proposed action is in conformance with the applicable LUPs because it is provided for in the ROD. The ROD and LUPs provide the basis for current management of the NPR-A planning area.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

- NPR-A IAP/EIS (December 2012) and ROD (February 2013)
- Colville River Special Area Management Plan and associated Environmental Assessment, and Decision Record (July 2008) September 27, 2013 (Colville River Special Area Management Plan update)

D. NEPA Adequacy Criteria

1. a. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document?

Yes. The current proposal is part of the preferred alternative previously analyzed in the NPR-A plan. The ROD authorized multiple oil and gas lease sales for the land BLM is offering in the 2016 lease sale. This proposed lease sale will be the third within NPR-A under the 2013 ROD.

1. b. Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document? If there are any differences, can you explain why they are not substantial?

Yes. The proposed lease sale is within the same analysis area analyzed in the NPR-A IAP/EIS.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Yes. The NPR-A IAP/EIS analyzed a broad range of alternatives for the entire NPR-A planning area, including alternatives that closed various areas to leasing. Each alternative

included a wide range of stipulations and BMPs to protect surface resources and address a wide variety of environmental concerns, interests, and resource values.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-Sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. The existing analysis and conclusions are adequate as provided for within the 2012 NPR-A IAP/EIS and the 2013 ROD. There are no new information or circumstances that would substantially change the analysis for the proposed lease sale.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in existing NEPA documents?

Yes. The direct, indirect, and cumulative impacts of this proposed action are similar and essentially unchanged from those identified in the multiple sale analysis in the NPR-A IAP/EIS, both from a quantitative and qualitative standpoint. BLM monitoring of activities in the NPR-A since the completion of the IAP indicate that impacts are consistent with those that were anticipated and analyzed.

This is an exploratory lease area and therefore there is no current production or wells capable of production in the proposed lease area. Oil production is unknown for the lease sale area and generally may be concentrated in the northeast quadrant of the NPR-A within the existing leased areas. Oil production probability is estimated to be low throughout most of the lease sale area. Oil Production probability for the northeast quadrant of the NPR-A on the high priority leases offered may be slightly higher. Areas to the south and west are prone to Natural gas production that is not economically producible.

Air pollutant emission impacts and greenhouse gas impacts are similar and unchanged from the discussion and analysis found in the National Petroleum Reserve- Alaska final Integrated Activity Plan/Environmental Impact Statement. Any related direct and indirect air pollutant impacts and greenhouse gas emissions related to exploratory wells and potential development on any parcels offered in this sale has been discussed and analyzed in the document. Once a lease is determined to be capable of producing oil in paying quantities, BLM will have the data and will conduct a more rigorous analysis before permitting production facilities.

In its Memorandum dated August 1, 2016—Final Guidance on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews—the Council on Environmental Quality (CEQ) provided a framework for agencies to consider both the effects of a proposed action on climate change and the effects of climate change on a proposed action. Among other things, the guidance advises agencies to quantify projected greenhouse gas emissions for proposed federal actions whenever the necessary tools, methodologies, and data inputs are available. CEQ recommends that where agencies do not quantify a proposed agency action's projected greenhouse gas (GHG) emissions because tools, methodologies, or data inputs are not reasonably available to support calculations for a quantitative analysis, agencies include a qualitative analysis in the NEPA document and explain the basis for determining that quantification is not

reasonably available. The Integrated Activity Plan (IAP) of the National Petroleum Reserve in Alaska (NPR-A) on which the forthcoming sale is based was released in 2013.

The BLM has carefully reviewed the IAP in preparation of this sale and determined that its analysis of potential impacts still reflects the best available information. With respect to climate change, the IAP contains a robust qualitative discussion of potential impacts. The BLM has reviewed that analysis and determined it remains relevant to the lease sale being proposed.

The IPA did not quantify GHG emissions because data remains unavailable about the development potential in the NPR-A. While the United States Geological Survey has prepared an assessment of resources within the NPR-A, that assessment primarily covers areas that are already leased and/or not currently available for development. There is no current petroleum production or existing wells capable of production in NPR-A more generally, or in the lease sale area specifically. Moreover, the data BLM does have suggests that the oil production probability is low throughout most of the lease sale area (although some areas are thought to have potential that is somewhat higher). Available data for natural gas production is similar, although BLM currently estimates that potential production is only low to moderate within the lease sale area. In the future, after additional exploration and/or some of the existing leases are determined to be capable of producing oil in paying quantities, BLM may have the data to conduct a more rigorous quantitative analysis of potential production, such that potential direct and indirect GHG emissions related to leasing activities can be estimated.

Until such time, the NPR-A is considered an exploratory basin as such there is not sufficient data to estimate potential production from any wells that might be drilled on the leases being offered for sale. Since there are no available data associated with this upcoming NPR-A oil and gas lease sale to support a quantitative analysis of greenhouse gas emissions, the BLM believes it is appropriate to rely on the qualitative analysis in the IAP.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. The NPR-A IAP/ involved extensive public participation and specifically addressed multiple oil and gas lease sales, including the area proposed to be made available for leasing in the 2016 lease sale. BLM has also issued two Federal Register notices pertaining to the proposed lease sale, on March 31, and in the Fall of 2016.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource Represented
Wayne Svejnoha	Chief, Energy and Minerals Branch	Oil and Gas
Carol Taylor	Chief, Mineral Law	Oil and Gas

Note: Refer to the NPR-A IAP/EIS for a complete list of the team members participating in the preparation of the original planning documents.

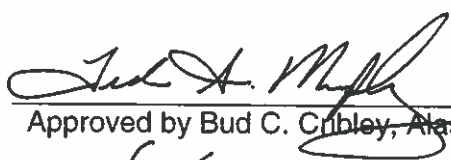
Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plans and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.


Prepared by Gina A. Kendall, Mineral Law Specialist

November 2, 2016

Date


Approved by Bud C. Cribley, Alaska State Director

11-2-16

Date


Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

Map 1: NPR-A Proposed Sale Lease Tracts

